

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Case No. 1:24-cv-04806 (KPF)
	:	
JOHN BRDA,	:	
GEORGIOS PALIKARAS,	:	
	:	
Defendants.	:	
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SUPPLEMENTAL DECLARATION OF JOHN BRDA

1. My name is John Brda. I am over twenty-one (21) years of age, fully competent to testify, and the facts set forth herein are true, correct, and based on my personal knowledge. I make this unsworn declaration pursuant to 28 U.S.C. § 1746.

2. This supplemental declaration is being submitted in relation to the same issues in the motion to transfer venue (ECF No. 18 at 15) and in reply to new factual assertions made for the first time in the Securities and Exchange Commission’s Opposition (ECF No. 32) and the Declaration of Ty S. Martinez (ECF No. 33).

3. At trial, I presently anticipate calling, *inter alia*, the following key and material witnesses with firsthand knowledge: (1) Roger Wurtele, the former Chief Financial Officer of Torchlight, who resides in Plano, Texas, and may offer testimony regarding the preparation of Torchlight’s financials, its public filings, and the merger with Metamaterial, Inc. (“Meta I”); (2) Gregory McCabe, a former Torchlight board member, who resides in Midland, Texas, and may offer testimony regarding the preparation of Torchlight’s financials, its public filings, Torchlight’s

oil and gas assets, and the merger with Meta I; and (3) Robert Lance Cook, a former Torchlight board member and former member of Torchlight's Audit Committee, who resides in Houston, Texas, and may offer testimony regarding the preparation of Torchlight's financials, its public filings, and the merger with Meta I.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 10, 2024.

St. Louis, Missouri



JOHN BRDA